## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA, ON BEHALF OF ITS	)
AGENCY, SECRETARY OF U.S. DEPARTMENT OF	)
HOUSING AND URBAN DEVELOPMENT,	) Case No.: 14-cv-5363
	)
Plaintiff,	)
	)
v.	) Judge: Harry D.
WILLIAM P. BUTCHER AS SPECIAL	) Leinenweber
REPRESENTATIVE OF THE ESTATE OF VIRGIE	)
HURD SPENCER A/K/A VIRGIE SPENCER; CAROL	)
LANDIS HURD; ARROW FINANCIAL SERVICES,	)
LLC; UNKNOWN HEIRS AND LEGATEES OF VIRGIE	)
HURD SPENCER A/K/A VIRGIE SPENCER;	) Magistrate Judge: Sheila
UNKNOWN OWNERS AND NON-RECORD	) Finnegan
CLAIMANTS;	)
	)
Defendants.	)

## MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, ON BEHALF OF ITS

AGENCY, SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN

DEVELOPMENT, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1", Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

**United States Attorney** 

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## **CERTIFICATE OF SERVICE**

I, Caleb J. Halberg, certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record, if any, through operation of the Court's Case Management/Electronic Case Files system on November 20, 2014, and on the following non-ECF filers by first class mailing November 21, 2014:

William P. Butcher as Special Representative of the Estate of Virgie Hurd Spencer a/k/a Virgie Spencer 2044 Ridge Road Homewood, IL 60430

Carol Landis Hurd 1013 Railton St. Memphis, TN 38111

Arrow Financial 801 Adlai Stevenson Drive Springfield, IL 62703

Unknown Heirs and Legatees of Virgie Hurd Spencer a/k/a Virgie Spencer 10330 South Emerald Avenue Chicago, Illinois 60628

Unknown Owners and Non-Record Claimants 10330 South Emerald Avenue Chicago, Illinois 60628

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